

IN RE: KRZYSZTOF SONTAG and	:	CHAPTER 13
PATRICIA ANN SONTAG	:	
Debtors	:	
	:	
JACK N. ZAHAROPOULOS	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
vs.	:	
	:	
KRZYSZTOF SONTAG and	:	
PATRICIA ANN SONTAG	:	
Respondents	:	CASE NO. 1-23-bk-00465

Case 1:23-bk-00465-HWV Doc 37 Filed 06/30/23 Entered 06/30/23 09:32:03 Desc
Main Document Page 1 of 2

5. The Trustee provides notice to the Court as to the ineffectiveness of debtor' Chapter 13 Plan for the following reasons:

- a. The plan incorrectly indicates that the debtors are under median.

WHEREFORE, Trustee alleges and avers that debtors' plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 30th day of June, 2023, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Gary Imblum, Esquire
4615 Derry Street
Harrisburg, PA 17111

/s/Deborah A. DePalma
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee